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Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

MARIA TSATAS, an individual;
LEONIDAS VALKANAS, as trustee
of the KEET TRUST dates August 1,
2015; RAYMOND BARAZ, an
individual; PASCAL ABDALLAH, an
individual; JIMMY TSOUTSOURAS,
an individual; FOTINI VENETIS, an
individual; NICHOLAS
TSOUTSOURAS, an individual;
CONNIE TSOUTSOURAS, an
individual; RAYMONDE KANHA, an
individual; ALFRED BEKHIT, an
individual; JACQUEZ ELBAZ, an
individual; MARTINE BENEZRA, an
individual; JAMES P. CARROLL, an
individual; DAVID CHIN, an
individual; JENNIFER MILLS, an
individual; PAUL SUBLETT, an
individual; ANDREW SUBLETT, an
individual; MANOLIS KOSTAS, an
individual; ESTHER
GEORGAKOPOULOS, an individual;
EVAGELIA KOSTAKIS, an
individual; DENIS PARSONS, an
individual; SOFIA KARDARAS, an

Case No.: 2:20-cv-02045-RFB-BNW

**STIPULATION TO EXTEND TIME
TO FILE OPPOSITIONS AND
REPLY BRIEFS TO MOTIONS TO
COMPEL (ECF Nos. 66 – 73)**

(Second Request)

00185410

individual; JIMMY ASMAKLIS, an
individual; CORRADINO GALUPPO,
an individual; DENIS KOPITAS, an
individual; TERRY TSATAS, an
individual; GEORGE TSATAS, an
individual; PANAGIOTA TSATAS, an
individual; OURANIA TSATAS, an
individual; KIRIAKOS PRIMBAS, an
individual; EVANTHIA PRIMBAS, an
individual; PATRICK AYOUB, an
individual; MICHAEL BESCEC, an
individual; ERNEST LEBOEUF, an
individual; PHILIPPE LEGAULT, an
individual; EFTIHIOS LITSAKIS, an
individual; GIOVANNI MONCADA,
an individual; MARC RIEL, an
individual; JARADEH SALIM, an
individual; HANI HAMAM, an
individual; CONSTANTIN ZISSIS, an
individual; BESSIE PEPPAS, an
individual; NIKI PALIOVRAKAS, an
individual

Plaintiffs,

v.

AIRBORNE WIRELESS NETWORK,
INC., a Nevada Corporation;
MICHAEL J. WARREN, an
individual; J. EDWARD DANIELS, an
individual; MARIUS DE MOS, an
individual; JASON DE MOS, an
individual; ROBERT BRUCE
HARRIS, an individual; KELLY
KABILAFKAS, an individual; and
APCENTIVE, INC., a Nevada
Corporation,

Defendants.

STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS AND REPLIES

Plaintiffs (as listed in the above caption) and Defendants (as listed in the above caption) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulation to Extend Time to File Oppositions and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

WHEREAS, on August 27, 2021, Plaintiffs filed eight (8) Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73), and on August 31, 2021, the Court set hearing dates on the Motions to Compel as follows (ECF No. 75):

- October 26, 2021 at 10:00 a.m. (ECF Nos. 66, 67, 68).
- October 28, 2021 at 10:00 a.m. (ECF Nos. 69, 70, 71).
- November 3, 2021 at 10:00 a.m. (ECF Nos. 72, 73).

WHEREAS, at the September 3, 2021 hearing on Defendants’ Motion to Dismiss (ECF No. 39), Rule 11 Motion (ECF No. 50), and Motion to Stay (ECF No. 53), the Court ordered the Parties to further meet and confer regarding the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) in light of its rulings that day (ECF No. 76);

WHEREAS, the Parties agreed thereafter that they needed additional time to meaningfully have further meet and confer discussions and filed a stipulation for the same (ECF No. 76);

WHEREAS, on September 9, 2021, the Court granted the Parties Stipulation and Ordered Defendants’ Oppositions to the Motions to Compel to be filed by October 1, 2021 and Plaintiffs’ Replies are to be filed by October 8, 2021 (ECF No. 78);

WHEREAS, since the Court’s Order, Defendants have agreed to provide supplemental responses to many of the discovery requests at issue;

WHEREAS, Plaintiffs reserve the right to argue that Defendants should nonetheless be sanctioned for not providing supplemental responses before the Motions to Compel were filed;

WHEREAS, Plaintiffs also reserve the right to argue that any supplemental responses Defendants may provide are still inadequate;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their respective attorneys of record, that, for good cause, the deadlines to file Opposition and Replies to the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) are extended by one week as follows:

Current deadline to file Oppositions to Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	October 1, 2021
New deadline to file Oppositions to Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	October 8, 2021
Current deadline to file Replies re Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	October 8, 2021
New deadline to file Replies re Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73)	October 15, 2021

IT IS SO STIPULATED.

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1 Dated: September 29, 2021

NOVIAN & NOVIAN, LLP

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3 By: s/ Andrew B. Goodman
4 ANDREW B. GOODMAN
Attorneys for Plaintiffs

5 Dated: September 29, 2021

THE MALONEY FIRM, APC

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7 By: s/ Gregory M. Smith
8 GREGORY M. SMITH
9 Attorneys for Defendants

10 IT IS SO ORDERED:

11 
12 UNITED STATES MAGISTRATE JUDGE

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14 Dated: September 30, 2021

CERTIFICATE OF SERVICE

I certify that all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of the above document on September 29, 2021, via the Court's CM/ECF system. Any other parties or counsel of record will be served by regular and/or electronic mail.

By: s/ Gregory M. Smith
GREGORY M. SMITH